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Attorney for Defendant RUSSELL TAYLOR OTT

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

UNITED STATES OF AMERICA,

**No. CR 17 533 EMC**

Plaintiff,

**TRIAL GROUP ONE JOINT  
OBJECTION TO TRIAL EXHIBITS FOR  
May 3, 2022**

v.

RUSSELL TAYLOR OTT,

Defendant.

**TO: THE UNITED STATES ATTORNEY FOR THE NORTHERN DISTRICT OF  
CALIFORNIA; ASSISTANT UNITED STATES ATTORNEYS KEVIN BARRY,  
AJAY KRISHNAMURTHY AND LINA PENG; AND TO THE CLERK OF THE  
ABOVE-ENTITLED COURT:**

On April 29, 2022 the government provided notice to Nelson Trial Group One that,  
among other witnesses, it intends to call law enforcement officer Liza Fornaciari as a witness and  
introduce approximately 65 exhibits (GX 547, 548, 59, 119, 123, 323-393). the vast majority of  
these items of physical evidence seized from the Fresno Hells Angels clubhouse, mainly a wide

**TRIAL GROUP ONE JOINT OBJECTION  
TO TRIAL EXHIBITS (5/3/22)**

1 variety of guns, ammunition, other weapons. (United States' Witness and Exhibit List: May 3, 2022)

2 All defendants objects to the array of actual guns, ammunition, and weapons to be  
3 introduced as evidence to the jury, and presumably then displayed and published. General  
4 objections on FRE 404 and 403 grounds are renewed, and it is submitted that the group of  
5 weaponry exhibits are of limited relevance or probative value, prejudicial, cumulative, and will  
6 cause unnecessary delay. In its sealed Order re Parties' Motions in Limine (ECF 2513) the Court  
7 deferred ruling on limiting the display or introduction of photographic evidence of actual  
8 firearms, components of firearms, or ammunition. *Id.* at 67-69. Now the government is seeking  
9 wholesale admission of the actual cache of firearms and ammunition, rather than just  
10 photographs, and the defense is objecting to the admission of either. On the afternoon of April  
11 26, 2022, the Court specifically addressed the issue of introducing loads of weapons and  
12 ammunition in this case, and the excerpt of that portion of the trial transcript is attached hereto as  
13 Exhibit A.

14 For the Court's consideration and review, pasted below is a more detailed list of all the  
15 exhibits sought to be introduced by Special Agent Fornaciari. Not all of these items are weapons  
16 or ammunition, but the list is clearly dominated by such evidence.

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Liza Forrester			
<a href="#">GX 0547</a>	1A222		Photographs - search of 2273 S. G Street
<a href="#">GX 0548</a>	1A221		Photographs - search of 2273 S. G Street
<a href="#">GX 0059</a>	1B582		Joseph Hardisty HA Fresno Membership Application and Agreement
<a href="#">GX 0119</a>	1B584		HA Fresno Bylaws & Rules
<a href="#">GX 0123</a>			HAMC Rulebook (01-25-16)
<a href="#">GX 0323</a>	1B633 (Item #160)		HASC stickers, and HA stickers from chapters around the world
<a href="#">GX 0325</a>	1B628		(U) Item #155: Leather vest
<a href="#">GX 0326</a>	1B627		(U) Item #154: Bushnell scope
<a href="#">GX 0327</a>	1B624		(U) Item #151: Two (2) bullet fragments
<a href="#">GX 0328</a>	1B622		(U) Item #149: 6 bullet loader
<a href="#">GX 0329</a>	1B620 (Item #147)		Nelson framed boxing trunks
<a href="#">GX 0330</a>	1B619		(U) Item #146: AR-15 Rifle (Upper Receiver) Make: N/A, Model: N/A, Caliber: 556, S/N: None
<a href="#">GX 0331</a>	1B617		(U) Item #144: Magazine
<a href="#">GX 0332</a>	1B616		(U) Item #143: Magazine
<a href="#">GX 0333</a>	1B615		(U) Item #142: Two (2) magazines
<a href="#">GX 0334</a>	1B610		(U) Item #137: Hells Angel photo in frame, Richmond 2013
<a href="#">GX 0335</a>	1B605		(U) Item #132: Magazine with ammunition
<a href="#">GX 0336</a>	1B604		(U) Item #131: Misc ammunition
<a href="#">GX 0337</a>	1B603		(U) Item #130: Shotgun shells
<a href="#">GX 0338</a>	1B590		(U) Item #117: Misc ammunition
<a href="#">GX 0339</a>	1B589		(U) Item #116: High capacity magazine with ammo
<a href="#">GX 0340</a>	1B585		Photo: Raneri, 2 unknown HAs
<a href="#">GX 0341</a>	1B584 (Item #111)		Out/no good binder, application packets
<a href="#">GX 0343</a>	1B581		(U) Item #108: BB
<a href="#">GX 0344</a>	1B580		(U) Item #107: 9mm Luger cartridge case
<a href="#">GX 0345</a>	1B579		(U) Item #106: bb
<a href="#">GX 0346</a>	1B578		(U) Item #105: Grim reaper wall art
<a href="#">GX 0347</a>	1B576		(U) Item #103: Boston patch
<a href="#">GX 0348</a>	1B574		(U) Item #101: Knife in wooden box
<a href="#">GX 0349</a>	1B573		(U) Item #100: One (1) Pistol, Manufacturer: GLOCK GMBH, Model: 19, Caliber: 9, S/N: XTH290, Country: Austria, Importer: Glock Inc, Smyrna GA

A	B	C	D
Exhibit No.	FBI Item #	File Name	Description
<a href="#">GX 0350</a>	1B572		(U) Item #99: Smith and Wesson 5.56 cal carbine, Model: M&P-15, S/N: ST94642
<a href="#">GX 0351</a>	1B571		(U) Item # 98: Ruger Rifle, Model: 10/22, Caliber: 22, S/N: 120-29447
<a href="#">GX 0352</a>	1B570		(U) Item #97: Anderson Manufacture 5.56 cal Carbine; Model: AM-15; S/N: 15079957
<a href="#">GX 0353</a>	1B569		(U) Item #96: Mossberg Shotgun, Model: 500, Caliber: 12, S/N: J521128
<a href="#">GX 0354</a>	1B568		(U) Item #95: AR-15; Caliber: 556; Model: Unkown; S/N Unknown
<a href="#">GX 0355</a>	1B567		(U) Item #94: AR-15; Caliber: 556; Model: Unkown; S/N Unknown
<a href="#">GX 0356</a>	1B566		(U) Item # 93: Standard Shotgun, Model: DP-12, Caliber: 12, S/N: DP18494
<a href="#">GX 0357</a>	1B565		(U) Item #92: Two (2) Luger 9mm cartridge cases
<a href="#">GX 0358</a>	1B564		(U) Item #91: Shot shell
<a href="#">GX 0359</a>	1B563		(U) Item #90: Bullet fragment
<a href="#">GX 0360</a>	1B562		(U) Item #89: Bullet fragment
<a href="#">GX 0361</a>	1B561		(U) Item #88: Bullet fragment
<a href="#">GX 0362</a>	1B560		(U) Item #87: Green bag with shot shells
<a href="#">GX 0363</a>	1B559		(U) Item #86: Bullet fragments
<a href="#">GX 0364</a>	1B558		(U) Item #85: Two (2) bullet fragments
<a href="#">GX 0365</a>	1B554		(U) Item #81: Cartridges in glass
<a href="#">GX 0366</a>	1B553		(U) Item #80: Seven (7) shot shells in bag



Exhibit No.	FBI Item #	File Name	Description
<a href="#">GX 0367</a>	1B550		(U) Item #77: Four (4) cartridges
<a href="#">GX 0368</a>	1B547		(U) Item #74: Red Knit watchcap "Richmond"
<a href="#">GX 0369</a>	1B543		(U) Item #70: Poster and documents
<a href="#">GX 0370</a>	1B542		(U) Item #69: Red bucket containing ammo
<a href="#">GX 0371</a>	1B541		(U) Item #68: Vest
<a href="#">GX 0372</a>	1B539		Photo: Raneri, other HAs
<a href="#">GX 0373</a>	1B535		(U) Item #62: Picture frame and plaques
<a href="#">GX 0374</a>	1B533		(U) Item #60: Whip
<a href="#">GX 0375</a>	1B532		(U) Item #59: Loader and box containing ammo
<a href="#">GX 0376</a>	1B530		(U) Item #57: Hammer
<a href="#">GX 0377</a>	1B529		(U) Item #56: Taser
<a href="#">GX 0378</a>	1B528		(U) Item #55: Magazine and fourteen (14) cartridges; 45 caliber
<a href="#">GX 0379</a>	1B527		(U) Item #54: One (1) Pistol, Manufacturer: GLOCK GMBH, Model: 30, Caliber: 45, S/N: PWA060, Country: Austria, Importer: Glock Inc, Smyrna GA
<a href="#">GX 0380</a>	1B523		(U) Item #49: Knife
<a href="#">GX 0381</a>	1B519		(U) Item #45: Knife
<a href="#">GX 0382</a>	1B518		(U) Item #44: Knife
<a href="#">GX 0383</a>	1B512 (Item #38)		Framed photo: HASC Salem collage, includes Ranieri
<a href="#">GX 0384</a>	1B509		(U) Item #32: Documents
<a href="#">GX 0385</a>	1B507		(U) Item #30: "Loose-talk costs lives" paper
<a href="#">GX 0386</a>	1B506		(U) Item #29: Framed photo

Exhibit No.	FBI Item #	File Name	Description
<a href="#">GX 0387</a>	1B498		(U) Item #21: "Hells Angel" black shirt
<a href="#">GX 0388</a>	1B496		(U) Item #19: White hat "Support Sonoma County 81"
<a href="#">GX 0389</a>	1B495		(U) Item #18: Hammer
<a href="#">GX 0390</a>	1B491		(U) Item #14: "NO CELL PHONES" sign
<a href="#">GX 0391</a>	1B488		(U) Item #11: Piece of wood
<a href="#">GX 0392</a>	1B483		(U) Item #6: Magazine containing ammunition
<a href="#">GX 0393</a>	1B482		(U) Item #5: Box containing thirty-four (34) cartridges - Winchester 38 Special +p

The defense objects to the introduction of all the weapons and ammunition and/or photographs of all those items for the reasons previously and presently stated.

Dated: May 1, 2022

Respectfully submitted,

/s/  
ROBERT F. WAGGENER  
 MARCIA M. MORRISSEY  
 Attorneys for Russell T. Ott